

FEB 13 1984

**BOSTON EDISON COMPANY**  
EXECUTIVE OFFICES  
800 BOYLSTON STREET  
BOSTON, MASSACHUSETTS 02199



RDMS DocID

110113

**RICHARD J. COUGHLIN**  
VICE PRESIDENT  
PROCUREMENT, STORES AND SERVICE ORGANIZATION

February 10, 1984

Environmental Protection Agency  
State Waste Program  
John F. Kennedy Federal Building  
Boston, MA 02203

Re: Boston Edison Company  
Materials Management Center  
Watertown, MA MAD000845412  
Interim Status

Dear Sir/Madam:

On November 18, 1980 Boston Edison Company submitted to the Environmental Protection Agency a Part A application for interim status as a hazardous waste facility under the Resource Conservation and Recovery Act (RCRA) for Boston Edison's Materials Management Center in Watertown, Massachusetts, EPA ID #MAD000845412. As was stated in the cover letter for that submittal, Boston Edison was not certain at that time whether such application was legally or technically required under applicable state and federal laws and regulations governing hazardous waste facilities. It is presently Boston Edison's view that the Materials Management Center is not a hazardous waste facility and such interim status is not required. Consequently, Boston Edison hereby withdraws its Part A application for the Materials Management Center.

The hazardous waste process identified in our Part A application was the storage of hazardous wastes in containers, specifically, the storage of spent solvents and "fullers earth" (clay) which was believed to be toxic. The facility still generates these materials in addition to waste oils, waste PCB oil and waste PCB equipment which have since become hazardous under the Massachusetts hazardous waste regulations, 310 CMR 30.000.

While the facility does generate such wastes, it should be noted that the facility is operated so that these wastes are not stored greater than 90 days as evidenced by our Annual Reports, and it is our intention to continue to operate the facility in that manner in accordance with the requirements of 310 CMR 30.340. Furthermore, all PCB wastes will be handled and managed in accordance with all the requirements of the TSCA regulations 40 CFR 761. Therefore, we request that interim status as a storage facility be dropped at the Materials Management Center and that we remain a generator with less than 90 day accumulation only.

It is intended that such change of status take effect prior to February 13, 1984 as discussed in your letter to facility owners or operators dated November 30, 1983.

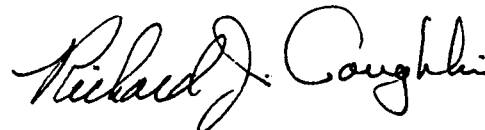
Environmental Protection  
Agency

-2-

February 10, 1984

If you have any questions regarding this matter, please feel free to call Mr. F. M. Lee, our Environmental Affairs Manager, at 424-2537.

Very truly yours,



/sjc

cc: Department of Environmental Quality Engineering  
Division of Hazardous Waste  
One Winter Street  
Boston, MA 02108

Department of Environmental Quality Engineering  
Division of Hazardous Waste  
323 New Boston Street  
Woburn, MA 01801

MAR 16 1984

BOSTON EDISON COMPANY  
GENERAL OFFICES 800 BOYLSTON STREET  
BOSTON, MASSACHUSETTS 02199

F. M. LEE  
MANAGER  
ENVIRONMENTAL AFFAIRS DIVISION

March 13, 1984

Ms. Nancy Wrenn  
Division of Hazardous Waste  
Department of Environmental  
Quality Engineering  
One Winter Street  
Boston, MA 02108

Re: Deferment of Financial Requirements

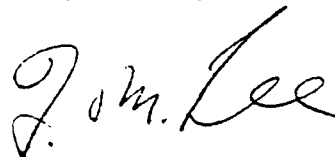
Dear Ms. Wrenn:

As requested, attached are signed Certification Statements for Boston Edison Company's Materials Management Center (MAD000845412), Mass Ave. Operations Center (MAD076575513) and Edgar Station (MAD000842393).

These statements certify our change of status request for these facilities (refer to the Company's letters of February 10, 1984) and further certify Boston Edison's compliance with the requirements outlined in Mr. Steven A. DeGabriele's letter of March 5, 1984.

If you have any further questions, please contact Mr. Peter Gravalles of my staff at 424-2584.

Very truly yours,



/sjc

Attachments

cc: Mr. Jacob Edwards  
State Waste Programs  
U.S. Environmental Protection Agency

Mr. Richard Chalpin  
Department of Environmental  
Quality Engineering

C E R T I F I C A T I O N

I, Richard J. Coughlin, Vice-President of Procurement,  
Stores and Service, hereby

(name)

(position)

certify that Boston Edison Company  
Materials Management Center, MAD000845412, which

(name of company)

(EPA I.D. #)

notified the U.S. Environmental Protection Agency ("EPA") that it treats, stores and/or disposes of hazardous waste, at all times from this date forward (1) will not accumulate any hazardous waste for more than 90 days; (2) will accumulate hazardous waste in compliance with 310 CMR 30.340; (3) will not store, treat, or dispose of hazardous waste; and (4) will comply with all other applicable requirements of 310 CMR 30.000.

I understand that the Department of Environmental Quality Engineering is deferring applicability of the financial responsibility requirements of 310 CMR 30.900 as a result of Boston Edison Company having submitted

(name of company)

a request for change of status and this certification, so long as

Boston Edison Company abides by the terms of this certification.

(name of company)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including possible fines and imprisonment.

Richard J. Coughlin  
(Signature)

Richard J. Coughlin

(Name typewritten)